

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

UNITED STATES OF AMERICA, <i>ex</i>	)	
<i>rel.</i> KAMAL MUSTAFA AL-SULTAN,	)	
	)	CIVIL CASE NO.
Plaintiff/Relator,	)	
	)	1:05-cv-02968-TWT
v.	)	
	)	
THE PUBLIC WAREHOUSING	)	
COMPANY, K.S.C., <i>et al.</i> ,	)	
	)	
Defendants.	)	

**CONSENT MOTION TO EXTEND FILING DEADLINES  
(FOR DEFENDANT THE SULTAN CENTER FOOD PRODUCTS  
COMPANY, K.S.C.)**

Defendant The Sultan Center Food Products Company, K.S.C. (“TSC” or “The Sultan Center”) and the United States of America (the “government”) hereby request that this Court enter an order extending (1) the deadline for TSC to file its answer and/or motion(s) in response to the First Amended Complaint, (2) the deadline for the government to file any response to TSC’s answer and/or motion(s), and (3) the deadline for TSC to file any reply.<sup>1</sup> Specifically, the parties respectfully request that the Court set the following agreed-upon deadlines:

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<sup>1</sup> TSC states that it is specially appearing here solely to seek entry of the proposed consent order regarding a briefing schedule. The filing of this consent motion does

- TSC will file its answer and/or motion(s) by August 1, 2016 [a Monday];
- The government will file any response by October 4, 2016 [the Tuesday after Rosh Hashanah]; and
- TSC will file any reply by November 4, 2016 [a Friday].

Good cause exists for extending the deadlines in this fashion, for the reasons detailed below, and no prejudice will result.

On February 5, 2016, the Court entered an Order granting the government's Motion for Service by Alternative Means on Defendants Resident in Kuwait (Dkt. 140.) As to TSC, the Court authorized alternative service by email and by publication. (*Id.* at 1.)

Undersigned counsel for The Sultan Center was not retained until June 28, 2016. Consequently, the parties agree that briefing should proceed according to the filing deadlines specified herein and in the Proposed Order attached to this motion.

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not constitute an admission that service has been proper, that this Court has jurisdiction over this case or TSC, or that venue is proper. TSC hereby expressly reserves, and does not waive, its right to bring motions to challenge service and/or the Court's jurisdiction and venue (as well as the adequacy of the pleadings) including, without limitation, motions under Federal Rules of Civil Procedure 12(b)(1)-(6) at a later time. The government takes no position with respect to these assertions at this time.

The parties believe that this agreed-upon schedule will provide both parties with adequate time to address the issues raised by the First Amended Complaint.

WHEREFORE, the parties respectfully request that the Court continue the deadline for TSC to file an answer and/or motion(s) in response to the First Amended Complaint until August 1, 2016; the deadline for the government to file any response to TSC's answer and/or motion(s) until October 4, 2016; and the deadline for TSC to file any reply until November 4, 2016.

Dated: July 7, 2016

Respectfully submitted,

s/ Anthony L. Cochran

Anthony L. Cochran

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Dated: July 7, 2016

Consented to by:

s/ Amy L. Berne

Amy L. Berne

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**STATEMENT OF COMPLIANCE**

I hereby certify that the foregoing Consent Motion for Extension of Filing Deadlines has been prepared using 14-inch Times New Roman font, in accordance with LR 5.1C.

*s/ Anthony L. Cochran*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2016, I electronically filed the foregoing Consent Motion for Extension of Filing Deadlines with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel of record.

*s/ Anthony L. Cochran*

Anthony L. Cochran

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